

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA

In re:)	
)	Case No. 17-20526-TPA
UNIQUE VENTURES GROUP, LLC,)	
)	Chapter 11
Debtor,)	
)	JUDGE THOMAS P. AGRESTI
)	
ALBERT'S CAPITAL SERVICES, LLC, as)	Adv. No: 18-AP-02249-TPA
Plan Administrator,)	
)	Doc. No.:
Plaintiff,)	
vs)	Related to Doc. No.:
)	
REINHART FOODSERVICE LLC,)	Hearing Date:
)	
Defendant.)	Hearing Time:
)	

**MOTION REQUESTING REISSUANCE OF SUMMONS AND
RESETING OF INITIAL CASE DEADLINES**

Albert's Capital Services, LLC, as the Plan Administrator (the "Plan Administrator") of the Chapter 11 bankruptcy of Unique Venture Group, LLC, respectfully requests the Court order the reissuance of the Summons and initial case documents in this matter. [Dkt. 5]. The reason for this request is that service of the Summons was not made due to counsel's inadvertent oversight and service of the Summons as-issued would present an immediate defense of improper service by the defendant. This request is made with the goal of avoiding unnecessary duplication of effort by the Court which could be avoided by reissuance of the Summons and its timely service by the below-signed. This request is also made in advance of the February 13, 2019, deadline for the commencement of adversary proceedings.

For the foregoing reasons, Albert's Capital Services, LLC, requests the Court order the reissuance of the Summons of this matter and the resetting of the answer date and pretrial dates thereof.

Respectfully Submitted,
Ross M. Babbitt Co., LPA

/s/ Ross M. Babbitt

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(admitted *pro hac vice*)

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and

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Unique Ventures Group, LLC*

CERTIFICATE OF SERVICE

The foregoing was filed electronically and served by operation of the Court's electronic filing system this 11th day of January, 2019.

/s/ Ross M. Babbitt

Counsel for Plaintiff